

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**GERALD LEONARD DRAKE**

Case No. 5:22-cr-08

**MOTION FOR VOLUNTARY DISCLOSURE OF GRAND JURY AND OTHER  
MATERIALS AND FOR LIMITATIONS ON FURTHER DISCLOSURE**

The United States, by counsel, moves pursuant to Federal Rules of Criminal Procedure 6(e), 16, and 26.2, 26 U.S.C. §§ 6103(h)(4)(D) and (i)(4)(A), and the authority of the Court to administer proceedings before it, that the United States be permitted to disclose to counsel for the defense as part of voluntary discovery, grand jury materials, tax return information, criminal histories, medical records, witness interview reports, materials covered by the Privacy Act, and other materials. The United States and defense counsel may then use this material for the prosecution and defense of this case, respectively, and make such further disclosures as may be necessary for, and for the sole purpose of, prosecuting and defending this case. The United States moves for entry of the attached proposed Order to cover any and all material provided by the United States Attorney's Office to defense counsel. The attached proposed Order is intended to:

1. Advance the case;
2. Protect the secrecy of grand jury, tax return, criminal histories, medical records, witness interview reports, and other materials;
3. Prevent the unauthorized dissemination of materials voluntarily provided by the United States, which dissemination would endanger witnesses, subject them to

intimidation, chill their candor, violate their privacy and impede future investigations; and

4. Provide notice of sanctions in the event these materials were deliberately disclosed in an unauthorized manner or to unauthorized persons.

Date: September 14, 2022

Respectfully submitted,  
CHRISTOPHER R. KAVANAUGH  
UNITED STATES ATTORNEY

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